



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

March 22, 2013

ANNIE HILL, TREASURER  
COMMUNICATIONS WORKERS OF AMERICA  
WORKING VOICES  
501 3RD STREET, NW  
WASHINGTON, DC 20001

**Response Due Date**  
**04/26/2013**

IDENTIFICATION NUMBER: C00488486

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2012 - 09/30/2012)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 1 item(s):

1. Schedule E for Line 24 of your report discloses MEMO entries for apparent independent expenditures made on behalf of "Barack Obama" during this reporting period. However, a Schedule D supporting Line 10 has not been provided for the remaining \$2,445.49 owed to "Apple Press." Please be advised that if a communication is aired in one reporting period and the payment is made in a later reporting period, the independent expenditure should be reported as a memo entry on Schedule E when the communication is publicly disseminated or distributed, and on a Schedule D if it is a reportable debt under 11 CFR §104.11. Subsequently, when the payment for the independent expenditure is made, the report should show a payment on Schedule E and the same payment on Schedule D, if applicable. Please amend your report to clarify this apparent discrepancy. (11 CFR §104.4)

- Schedule E for Line 24 of your report discloses MEMO entries for apparent independent expenditures made on behalf of "Barack Obama" and "Francisco Raul Canseco" during this reporting period. On Schedule B supporting Line 21(b) you disclose disbursements which appear to correspond to the memo entries disclosed on Schedule E. Please be advised that if a communication is aired and paid for in the same reporting period, the independent expenditure should only be disclosed on Schedule E supporting Line 24 as a non-memo entry. This method of reporting would better clarify for the public record the

COMMUNICATIONS WORKERS OF AMERICA WORKING VOICES

Page 2 of 2

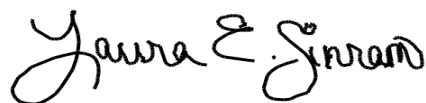
total amount of independent expenditures made by your committee.

- Schedule B of your report discloses an expenditure(s) for "Media Purchase MEDIA BUY." For your information and consideration when preparing future filings, if a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) containing express advocacy as defined under 11 CFR §100.22, this would constitute an independent expenditure and would be disclosed on a Schedule E supporting Line 24. Public communications that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate would be reported on Schedule B for Line 21(b) of the Detailed Summary Page.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1157.

Sincerely,



Laura Sinram  
Senior Campaign Finance Analyst  
Reports Analysis Division